



**U.S. Department of Justice**

*United States Attorney  
Northern District of New York*

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445 Broadway  
Room 218  
Albany, NY 12207

518-431-0247  
FAX: 518-431-0249

February 6, 2009

By Hand

William J. Dreyer, Esquire  
Dreyer Boyaijian LLP  
75 Columbia  
Albany, NY 12210

Re: United States v. Joseph L. Bruno, Crim. No. 09-CR-029

Dear Mr. Dreyer:

Pursuant to Fed. R. Crim. P. 16(a), Fed. R. Crim. P. 12(b)(4), and L. R. Cr. P. 14.1(b)(1), the United States provides you with the following discovery and gives notice of its intent to use as evidence in its case-in-chief at trial the following evidence:

Defendant's Oral, Written, and Recorded Statements, Fed. R. Crim. P. 16(a)(1)(A), (B):

Enclosed is a copy of FBI Form 302 prepared following your client's April 21, 2006 interview with the FBI.

Defendant's Prior Record, Fed. R. Crim. P. 16(a)(1)(D):

None.

Documents and Objects, Fed. R. Crim. P. 16(a)(1)(E):

Enclosed is a DVD containing documents of particular relevance, numbered 1-1789. In addition, we will be providing to you, in electronic format, documents identified in Attachment A. Finally, we have available for your review documents identified in Attachment B. Please contact FBI Special Agent Thomas Stewart at 465-7551 to arrange for such review.

Reports of Examination and Tests, Fed. R. Crim. P. 16(a)(1)(F):

None.

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Expert Witnesses, Fed. R. Crim. P. 16(a)(1)(G):

None.

404(b) Notice, N.D.N.Y. L. R. Cr. P. 14.1(b)(3):

At this time the United States does not intend to offer evidence in its case in chief at trial pursuant to Fed. R. Crim. P. 404(b). In the event that our intention changes we will notify you promptly and supplement this response.

The United States will provide transcripts, 302's, records of conviction, promises and immunity orders, and other similar materials in accordance with the time periods set forth in L. R. Cr. P. 14(d) and (e).

We assume that it is unnecessary to provide you with copies of documents you produced on behalf of your client during the investigation.

If you have any questions about these or any other matters, please call me at 431-0247.

Very truly yours,

GLENN T. SUDDABY  
UNITED STATES ATTORNEY

By: /s/ Elizabeth C. Coombe  
Elizabeth C. Coombe  
Assistant United States Attorney

cc: Hon. Gary L. Sharpe, U.S. District Judge  
(via ECF) (without enclosures or attachments)